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| MADISON MITCHELL (32) | § |
| HILDA GUTIERREZ-BENITEZ (33) | § |

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

**Conspiracy to Possess with Intent to Distribute and Distribution
of a Controlled Substance, Methamphetamine
(Violation of 21 U.S.C. § 846)**

1. Beginning on or about August 1, 2019, and continuing through March 2, 2021, in the Western District of Texas and elsewhere, **KARL BECK**, [REDACTED], [REDACTED], [REDACTED], **CRAIG NEELY**, **BOBBY HALE**, **MICHAEL PETERSON**, **ELIAS LOZA, JR.**, **REGINALD THOMAS**, [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], **AMY ROGERS**, [REDACTED], [REDACTED], [REDACTED], **VICTORIA MANNING**, [REDACTED], **ADRIANNE SPENCE**, [REDACTED], [REDACTED], **JOSHUA CHERRY**, **JOSHUA BAILEY**, [REDACTED], [REDACTED], **LEONARD CANTRELL**, [REDACTED], [REDACTED], [REDACTED], [REDACTED], **HALLIE SHAW**, [REDACTED], [REDACTED], **RITA ISLAS**, **MADISON MITCHELL**, and **HILDA GUTIERREZ-BENITEZ**, defendants, did intentionally and knowingly combine, conspire, confederate, and agree together and with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute and distribute methamphetamine, a Schedule II controlled substance.

**QUANTITY OF METHAMPHETAMINE INVOLVED IN COUNT ONE OF THE
CONSPIRACY**

2. With respect to **KARL BECK**, [REDACTED], [REDACTED], [REDACTED], [REDACTED], **MICHAEL PETERSON**,

ELIAS LOZA, JR., BOBBY HALE, CRAIG NEELY, and REGINALD THOMAS, their conduct as members of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846, the penalty for which is found at 21 U.S.C. § 841(b)(1)(A).

3. With respect to [REDACTED], [REDACTED], [REDACTED], **AMY ROGERS**, [REDACTED], [REDACTED], **VICTORIA MANNING**, [REDACTED], **ADRIANNE SPENCE**, [REDACTED], [REDACTED], **JOSHUA CHERRY, JOSHUA BAILEY**, [REDACTED], [REDACTED], [REDACTED], [REDACTED], **LEONARD CANTRELL**, [REDACTED], [REDACTED], [REDACTED], [REDACTED], **HALLIE SHAW**, [REDACTED], [REDACTED], **RITA ISLAS, MADISON MITCHELL, and HILDA GUTIERREZ-BENITEZ**, their conduct as members of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846, the penalty for which is found at 21 U.S.C. § 841(b)(1)(B).

COUNT TWO
Money Laundering
(Violation of 18 U.S.C. § 1956)

4. Beginning on or about August 1, 2019, and continuing through March 2, 2021, in the Western District of Texas and elsewhere, **KARL BECK**, [REDACTED], [REDACTED],

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[REDACTED], CRAIG
NEELY, BOBBY HALE, [REDACTED],

MADISON MITCHELL, and RITA ISLAS, defendants, and others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together, and with others known and unknown to the Grand Jury, to commit certain offenses under 18 U.S.C. §1956, as follows:

a) to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce that involved property which was the proceeds of specified unlawful activity, to wit, unlawful possession with intent to distribute a controlled substance, methamphetamine, with the intent to promote the carrying on of said specified unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

b) to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce that involved property which was the proceeds of specified unlawful activity, to wit, unlawful possession with intent to distribute a controlled substance, methamphetamine, with the intent to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of said specified unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

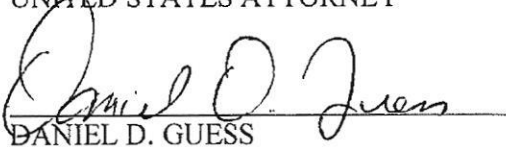
In violation of 18 U.S.C. § 1956(h), the penalty for which is found at 18 U.S.C. § 1956(a)(1).

A TRUE BILL

~~FOR~~

ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

ASHLEY C. HOFF
UNITED STATES ATTORNEY


DANIEL D. GUESS

Assistant United States Attorney